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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARCIA WELLS and TEENA ACREE,
individually and as Co-Special Administrators of the
Estate of Byron Lee Williams, Deceased, et al.,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, et al.,

Defendants.

CASE No.: 2:21-cv-01346

**STIPULATION AND ORDER TO
EXTEND TIME FOR
PLAINTIFF'S**

26(A)(2) EXPERT DISCLOSURES

Pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and Local Rule 26-3, Plaintiffs, Marcia Wells, Teena Acree, Tina Lewis-Stevenson, Gwendolyn Lewis, Robyn Williams, and Dewain Lewis (hereinafter, the “Plaintiffs”) and Defendants Las Vegas Metropolitan Police Department, Officer Patrick Campbell, Officer Benjamin Vasquez, Officer Alexander Gonzalez, and Officer Rocky Roman (hereinafter, the “Defendants”), by and through their respective counsel of record, hereby stipulate and agree to extend the time for Plaintiff’s to complete their FRCP 26(a)(2) disclosures. This Stipulation is being entered in good faith and not for purposes of delay.

I. STATUS OF DISCOVERY.

The parties have completed all but two depositions and have been working together to meet all pending deadlines.

II. DISCOVERY THAT REMAINS TO BE COMPLETED.

The parties have two controlled fact witness depositions and expert disclosures to complete by the discovery deadline of December 10, 2022 and are on track to do so.

III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.

Pursuant to Local Rule 26-3, the Parties submit that good causes exist for the extension requested. The Parties have been diligently conducting discovery and continue to conduct discovery. However, additional time is needed for Plaintiff’s expert disclosure, currently due October 10, 2022, because lead Plaintiff’s counsel has trials set for October 12, 2022 and October 24, 2022 that have had unexpected complications. Namely, that lead Plaintiff’s Counsel’s office has had another two trials that have gone forward in the month of October. In addition, Plaintiff’s expert has been unexpectedly required to testify in three different trials over

1 the course of the last few weeks. These matters make it unlikely Plaintiffs' counsel will be able
2 to complete expert disclosures by the previously agreed upon October 10, 2022 date.

3 **IV. ~~PROPOSED~~ SCHEDULE FOR COMPLETING REMAINING DEADLINES**

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	Current Deadline	Proposed New Deadline
5 Plaintiffs Initial Expert 6 Disclosures	October 10, 2022	October 28, 2022

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8 Based on the foregoing stipulation and proposed deadlines plan, the Parties request that the
9 Discovery Plan and Scheduling Order deadlines be extended as stated herein, so that the parties
10 may disclose experts.
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1 **IT IS SO STIPULATED AND AGREED.**

2 DATED this 6th day of October, 2022

DATED this 6th day of October, 2022

3 **ROMANUCCI & BLANDIN, LLC**

MARQUIS AURBACH COFFING

4 /s/ Bhavani Raveendran

/s/ Craig R. Anderson

5 Bhavani K. Raveendran

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Attorney for Plaintiffs

Attorney for Defendants

10 **IT IS SO ORDERED.**

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12 
13 UNITED STATES MAGISTRATE JUDGE

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15 DATED: October 7, 2022